

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

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C.A.	
	Plaintiff,
v.	<b>No.: 2:24-cv-04434-KNS</b>
<b>VILLANOVA UNIVERSITY, et al.</b>	
	Defendants.

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**ORDER**

**AND NOW**, this \_\_\_\_\_ day of December, 2024, upon consideration of the Plaintiffs' Motion for Extension of Time to File Responsive Pleading, it is hereby ORDERED that the Motion is GRANTED.

It is ORDERED that Plaintiffs shall file a responsive pleading to Defendant Villanova University's Motion to Dismiss by December 30, 2024.

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J.

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA

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**PLAINTIFFS' MOTION FOR EXTENSION OF TIME  
TO FILE RESPONSIVE PLEADING**

AND NOW, comes the Plaintiff, C.A., by and through undersigned counsel, and file the herein Motion for Extension of Time to File Responsive Pleading, as follows.

1. This action was initiated with a Complaint filed on August 22, 2024, in the Philadelphia Court of Common Pleas.
2. Defendant Villanova University removed this action on August 23, 2024 (ECF Doc. 1).
3. A Second Amended Complaint was filed on November 12, 2024 (ECF Doc. 21).
4. On or about November 26, 2024, Defendant Villanova University filed a Motion to Dismiss Plaintiff's Second Amended Complaint (ECF Doc. 25).
5. On or about that same day, counsel for Villanova University, James A. Keller, Esquire, agreed to give Plaintiff an extension to respond to the Motion to Dismiss

on or before December 30, 2024. See Exhibit A (Email between Keller and Paralegal Smith).

6. Due to the proximity of the agreement for additional time to respond and the Thanksgiving Holiday, a clerical error prevented the filing of this Motion earlier.

7. Additional time is required to gather information and draft a responsive pleading in this case.

8. Plaintiffs respectfully request an extension of time until December 30, 2024.

9. No party will be prejudiced by the proposed extension of time, as some parties recently ended.

**WHEREFORE**, Plaintiff, by and through undersigned counsel, respectfully request this Honorable Court grant the relief requested herein, and set the deadline for a responsive pleading as on or before December 30, 2024.

**EDELSTEIN LAW, LLP**

BY: /s/ Jay L. Edelstein  
JAY L. EDELSTEIN, ESQUIRE  
*Attorney for Plaintiffs*

**CERTIFICATION OF SERVICE**

I hereby certify that a copy of the within Civil Action – First Amended Complaint has been served on December 9, 2024 by this Court’s Electronic Filing System upon the following:

James A. Keller, Esquire  
Jesse Krohn  
Saul Ewing Arnstein & Lehr, LLP  
1500 Market Street, 38<sup>th</sup> Floor West  
Philadelphia, PA 19102  
E-Mail: [jesse.krohn@saul.com](mailto:jesse.krohn@saul.com)  
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*Attorneys for Villanova University*

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*Attorney for Elijah Joseph Katzenell*

and by electronic mail upon:

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*Attorneys for College Hall Assso. & College Hall GP*

**EDELSTEIN LAW, LLP**

BY: /s/ Jay L. Edelstein  
JAY L. EDELSTEIN, ESQUIRE  
*Attorney for Plaintiffs*

**Royce W. Smith**

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**From:** Keller, James A. <james.keller@saul.com>  
**Sent:** Tuesday, November 26, 2024 7:26 PM  
**To:** Royce W. Smith  
**Cc:** Krohn, Jesse L.  
**Subject:** Re: C.A. v. Villanova et al | Stipulation re Second Amended Complaint | 121.828

**EXTERNAL EMAIL.**

Of course, that's fine, Royce. Have a Happy Thanksgiving.

- Jim

James A. Keller  
2159721964  
James.Keller@saul.com  
Sent from my iPhone

On Nov 26, 2024, at 3:12 PM, Royce W. Smith <RSmith@edelsteinlaw.com> wrote:

Jim, I hope you and your family have a great Thanksgiving.

As of now, our reply to your MTD would be due 12/10.

I have two huge deadlines that day.

Would you consent to an extension to 12/30?

ROYCE W. SMITH, Litigation Paralegal  
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Fax: 215-893-9310  
[RSmith@Edelsteinlaw.com](mailto:RSmith@Edelsteinlaw.com)  
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**From:** Keller, James A. <James.Keller@saul.com>  
**Sent:** Tuesday, November 12, 2024 2:20 PM  
**To:** Royce W. Smith <RSmith@edelsteinlaw.com>; Shicora, Kristin <KShicora@Campbell-Trial-Lawyers.com>; Jay Edelstein <JEdelstein@edelsteinlaw.com>; Stephen Kotzen <SKotzen@edelsteinlaw.com>; Stephen J. Pokiniewski, Jr., Esquire <SJP@edelsteinlaw.com>